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OPEN MEETING AGENDA ITEM

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

SUSAN BITTER SMITH - Chairman
BOB STUMP
BOB BURNS
DOUG LITTLE
TOM FORESE

Arizona Corporation Commission

DOCKETED

APR 13 2015

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AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF
TRICO ELECTRIC COOPERATIVE, INC. FOR
APPROVAL OF A NET-METERING TARIFF,
THE PARTIAL WAIVER OF THE
COMMISSION'S NET METERING RULES
AND A REVISED AVOIDED COST RATE IN
THE COMPANY'S EXISTING NET METERING
TARIFF.

DOCKET NO. E-01461A-15-0057

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APR 10 2015

Kevin Koch, Chad Waits, and George Villec are all owners of Southern Arizona based solar installation companies which provide services within the TRICO territory. Our companies collectively have installed well over a thousand systems over the past 10+ years.

We would like to weigh in on two issues at this time.

TRICO'S PROPOSAL WILL INAPPROPRIATELY FREEZE THE SOLAR MARKET PENDING THE COMMISSION'S RULING.

By setting a "grandfathering" date of February 28, 2015, TRICO has unilaterally and without commission approval or discussion put a freeze on the solar market. The longer the process takes, the more likely companies working in TRICO territory will have to lay off staff and slow or cease their operations. If the commission rules that Net Metering should remain in its current form, damage will have been done to the solar industry which will have the effect of slowing the hard earned price reductions that we have achieved through consistent operations, tenured well trained staff, and reduced overhead expenses. TRICO's concerns regarding cost shifts do not justify its preemptive imposition of what amounts to a moratorium on new applications before the commission has even considered the issues raised in this application.

We request that the commission order TRICO to accept applications under the existing net metering rules until the commission comes to a decision regarding this application.

COST SHIFT DISCUSSIONS SHOULD BE HEARD IN A RATE CASE.

The issue of whether and how much there is a cost shift when Arizonans install grid tied solar systems has recently been addressed by the commission with regard to APS's Solar Surcharge request (Docket #: E-01345A-13-0248, Decision Date: August 12, 2014). The commission at that time ruled that the issue

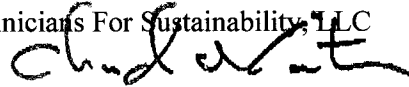
should be heard in a rate case, and ordered APS to file to address the issue in July of 2015. APS has since requested that their rate case application be postponed to 2016.

We feel that the attempts to change or eliminate net metering have been framed in terms of cost shifts, and therefore should be part of a rate case where the request can be heard in relation to other cost shifts inherent in TRICO's rates. Other cost shifts include larger users paying higher rates than modest users, and customers in dense locations paying the same as rural and widely dispersed customers. These decisions may not be fair on the surface, but were determined to be in the best interests of ratepayers through the rate case process. We suggest and request that the same consideration be given to the benefits and costs associated with widespread customer sited solar energy.

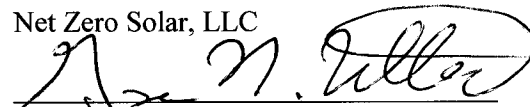
RESPECTFULLY SUBMITTED this 9th day of April, 2015.



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Chad Waits, Owner
Net Zero Solar, LLC



George Villec, Owner
Geoinnovation, LLC

CC: Arizona Corporation Commission (13)
TRICO Electric Cooperative (1)

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